



Equality Impact Assessment (EIA)

Activity being assessed	Revision of Income Management Policy (Policy review in line with policy review framework)	
Purpose of activity being assessed	Revision of Income Management Policy (Policy review in line with policy review framework)	
Lead officer	Amy Oliver	
EIA completed by (colleagues involved in completing EIA with lead officer)	Completed by: Amy Oliver Policy review completed through research and consultation with Income Team Leaders, Survey and Complaint Data and Customer Consultation	Reviewed / amendments suggested by:
Date EIA completed	November 2025	

Data used in preparing EIA

Data used	Insight obtained and associated considerations
Service users	This policy applies This policy applies to all VIVID customers across all tenures, including former customers. It covers rent, service charges, utilities, rechargeable repairs, and any other income owed to us. It is relevant to any customer who has a contractual obligation to make payments to VIVID. It is relevant to



	internal customer facing teams: Income, Debt Recovery, Service Charge & Leasehold Team, Neighbourhoods, Customer Resolution, Customer Experience, Financial Inclusion, Tenancy Sustainment etc.
- Uptake data - Service satisfaction data	The data considered includes - Recommendations from customer consultation – 20 customers - Recommendations from staff – Income officers and Income Team Leaders - Feedback from Complaints (77) 206 Case Closure survey responses
Complaints and compliments about the service	Data and feedback from complaints and compliments was analysed for themes, areas of satisfaction and dissatisfaction.
Survey of customers/colleagues	Written survey feedback from customers used within development of revised standards
Focus group	Not completed due to data protection of discussing this subject in this format
Written responses to policy	Customers feedback, via a survey, on the draft revised policy and changes made as a result.
Other - please list source	N/A

Data gaps

Info needed	Notes
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Lack of transactional surveys and feedback	Limited response due to nature of our contact with customers meaning there is a lack of engagement from customers – this could be perceived as a gap
Lack of customer resolution data	Minimal customer resolution data – a small number of complaints received regarding this topic This could be improved on creating a staff Domestic Abuse Policy which would need to be undertaken if we were to consider DAHA accreditation

Outline who this activity affects

Affected groups	Yes/No
Customers	Yes
Residents within wider community	No
Involved customers	Yes
Landlord employees / agents VIVID colleagues	Yes
Others – please list	Yes – Local Authorities, key stakeholders
	Household members including children

Potential impact on protected characteristics

Protected Characteristic	Summary of potential impacts	
Age	Positive Impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol. The policy emphasises throughout a support	Negative Impact n/a



	first approach which takes into account a customers individual circumstances such as any vulnerabilities which would be protected under the equality act.	
	Neutral Impact n/a	
Disability	Positive impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol. The policy emphasises throughout a support first approach which takes into account a customers individual circumstances such as any vulnerabilities which would be protected under the equality act.	Negative impact Customers experiencing mental health conditions, cognitive conditions or other medical issues (such as brain injuries) may have increased difficulty managing their accounts and engaging with us for support. Escalating legal action in cases where the debt is linked to capacity issues could breach the Equality Act 2010, unless that action is reasonable and proportionate.
	Neutral Impact n/a	
Race	Positive Impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol. The policy emphasises throughout a support first approach which takes into account a customer's individual circumstances such as any protected characteristics.	Negative Impact n/a
	Neutral Impact n/a	



Religion or Belief	Positive Impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol. The policy emphasises throughout a support first approach which takes into account a customer's individual circumstances such as any protected characteristics.	Negative Impact n/a
	Neutral Impact n/a	
Sex	Positive Impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol and commits to equitable treatment.	Negative Impact N/a
	Neutral Impact n/a	
Sexual orientation	Positive Impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol and commits to equitable treatment.	Negative Impact n/a
	Neutral Impact n/a	



Gender reassignment	Positive Impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol and commits to equitable treatment.	Negative Impact n/a
	Neutral Impact n/a	
Marriage or Civil Partnership	Positive impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol and commits to equitable treatment.	Negative Impact n/a
	Neutral Impact n/a	
Pregnancy and Maternity	Positive Impact Section 3.11 commits to considering customer needs under the Equality Act 2010 in line with preaction protocol and commits to equitable treatment.	Negative Impact n/a
	Neutral Impact n/a	



Additional characteristics to consider

Literacy	Positive impact The policy is designed to be accessible through multiple formats to accommodate varying literacy levels. Customers can access the policy via our website, request printed copies, receive it by email, or obtain versions in large print or alternative languages. These measures ensure that individuals with different literacy needs can fully understand and engage with the policy.	Negative impact People may not be aware of these options and some customers may still find the policy too long, detailed or complex, despite plain English.
	Neutral impact n/a	
Socio economic status	Positive impact As above Potential financial / affordability barriers removed via empathetic approach of officers from the outset e.g. reassurance and support with income maximisation, welfare fund and debt management support.	Negative impact As above
	Neutral impact n/a	



Consultations

Consultation completed (what, when, outcome)	Consultation needed (what, when due)
With customers: A total of 20 customer surveys were successfully completed regarding the policy as well as insight analysis from 77 complaints and 206 case closure surveys.	None
With colleagues: Draft before customer consultation - Income team leader. Amends made. Final draft - Director of Customer Services, Head of Operations and Head of Customer Experience, Income & FI Manager.	With colleagues: None

Mitigating negative impacts

Outline actions being undertaken to mitigate any potential or actual negative impact identified	A proportionality assessment is completed prior to a case being escalated to legal action when we are aware that a customer's may have vulnerabilities which hinder their ability to manage their payments, where the actions are assessed against the EA and the Public Sector Equality Duty
Identify any further action that could be undertaken to mitigate any potential or actual negative impacts	N/A



Result of EIA

Tick 1	Possible Outcomes
☒	No change needed: there's no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.
☐	Adjust the approach*: EIA has identified problems and the project will be amended to ensure these problems are mitigated. Policy to be created in alternate formats to ensure accessibility
☐	Continue the policy: there's a potential for the policy to adversely impact some groups or help some groups more than others. However, the reasons for this can be well justified and the policy will be implemented without amendments.
☐	Remove the policy: EIA shows that the policy is having a discriminatory effect and should be stopped immediately.

Continual Monitoring

Potential triggers for early review:

- Continued commitment to embed best practice
- Housing ombudsman spotlight reports
- Housing ombudsman determinations
- Independent audit findings and recommendations
- Changes in legislation

EIA approved by:

Date approved:

November 2025



Final copy of EIA emailed to Natalie Pearton on: